

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

Vanida Khautisen, as Personal Representative  
of the Estate of Khouanexay Bill Sivilay,

Plaintiff,

v.

BHG Holdings, LLC, and BHG XXXVIII,  
LLC,

Defendants.

C/A No. \_\_\_\_\_

**PLAINTIFF'S RESPONSES TO  
INTERROGATORIES PURSUANT TO  
LOCAL RULE 26.01 D.S.C.**

Plaintiff Vanida Khautisen, as Personal Representative of the Estate of Khouanexay Bill Sivilay, hereby responds to interrogatories required by Local Civil Rule 26.01 (D.S.C.) as follows:

1. State the full name, addresses and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: None.**

2. As to each claim, state whether it should be tried jury or non-jury and why.

**RESPONSE: The claims in Plaintiff's Complaint should be tried by a jury because Plaintiff has a right to a jury trial pursuant to the Seventh Amendment to the U.S. Constitution and has asserted that right in a demand for a jury trial pursuant to Rule 38(b) of the Federal Rules of Civil Procedure.**

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent of the outstanding shares.

**RESPONSE: Not applicable.**

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE: The acts and omissions described in the complaint occurred in the Spartanburg Division.**

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Please disclose any cases which may be related regardless of whether they are still pending. *Note:* Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: Plaintiff knows of no other related cases in this District.**

Respectfully submitted,

s/Richard A. Harpootlian

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VANIDA KHAUTISEN, AS PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
KHOUANEXAY BILL SIVILAY

November 18, 2021  
Charleston, South Carolina.